

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA

LAMONT BURRELL, General Guardian
for Brenda Allen Burrell,

Plaintiff,

v.

CHARLES JASON WILBORN, in his
individual and official capacity, Person
County Sheriff; NEEKA SHAVONNE
LAWSON, in her individual and official
capacity, TRAVIS LEE SLAUGHTER, in
his individual and official capacity;
HARRIETT SHAWN WAGSTAFF; in her
individual and official capacity; and THE
OHIO CASUALTY INSURANCE
COMPANY, as Surety,

Defendants.

Case No. 1:25-cv-376

**MOTION FOR EXTENSION OF TIME
FOR THE OHIO CASUALTY
INSURANCE COMPANY TO ANSWER
OR OTHERWISE RESPOND TO THE
COMPLAINT**

Defendant The Ohio Casualty Insurance Company (“Ohio Casualty”), by and through undersigned counsel, respectfully files this motion for an extension of time (the “Motion”) for Ohio Casualty in the above-referenced action to answer, move, object, or otherwise respond to the Complaint filed by Plaintiff in the above-referenced action (the “Complaint”). In support thereof, United states:

1. Ohio Casualty was lawfully served with the Summons and Complaint through the North Carolina Department of Insurance, which accepted service of process on behalf of Ohio Casualty on May 20, 2025.

2. Ohio Casualty did not receive a copy of the Summons and Complaint from the North Carolina Department of Insurance until June 3, 2025.

3. Ohio Casualty's deadline to answer or otherwise respond to the Complaint is currently June 10, 2025.

4. The time to answer or otherwise respond has not expired as to Ohio Casualty.

5. Additional time is needed for Ohio Casualty to investigate and prepare a response to the claims included in the Complaint.

6. Accordingly, Ohio Casualty respectfully requests thirty (30) additional days, or through and including July 10, 2025, to file its responsive pleading.

7. Counsel for Ohio Casualty conferred with counsel for the Plaintiff regarding this Motion, and Counsel for Plaintiff consented to the extension requested herein.

WHEREFORE, Ohio Casualty respectfully requests the Court to enter an Order extending the time for United to answer or otherwise respond to the Complaint in this matter to and including July 10, 2025.

Respectfully submitted on this, June 6, 2025.

/s/ David A. Harris

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